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Blue Ireland is an association of citizens' groups who have come together with a shared vision to protect our seas, in light of government plans for vast offshore wind development around the Irish coast. Blue ireland advocates for vibrant healthy seas with environmentally sited offshore renewable energy (ORE) development.

coastal concern alliance

Submission on MUL240023 – Iarnród Éireann / ECRIPP application

Joint submission from: Blue Ireland Alliance CLG (info@blueireland.org) , Killiney Bay Community Council (info@killineycommunitycouncil.ie) and Coastal Concern Alliance (info@coastalconcern.ie)

Date: 15 August 2025

Introduction and standing

This submission objects to the proposed granting o consent for Maritime Usage Licence MUL240023 for Iarnród Éireann's proposed marine works under the Eastern Coastal Rail Infrastructure Protection Project (ECRIPP). We are concerned that the proposal and site activities (over 10 years), as set out in the application documents and related environmental assessments, appears to be miscategorised as being wholly site investigation or survey activity in nature.

In reality, the works as described would appear to be more extensive pre-construction and ground-preparation operations, involving deep drilling and seabed interventions within and adjacent to sensitive SACs, SPAs, and IBAs, with the potential to cause deterioration and damage to habitats and species protected under the Habitats and Birds Directives. The application, and MARA's processing/review of this application to date, appears to point to the ned for an EIA to avoid a perception of potential project splitting or salami slicing, which could arise from inadequate cumulative impact assessment, flawed mitigation assumptions, and what could appear to be an overall downplaying of effects and impacts , and what seems to be somewhat a general

disregard of strict protection obligations. The consultation arises under s.117(6)(b) of the Maritime Area Planning Act 2021 further to MARA's s.117(6)(a) notice requiring a revised NIS. The closing time is 17:30 on 15 August 2025 (see: Request-for-Observations-from-Public-Bodies.pdf; S.1176a-notice-revised-NIS-required-.pdf; S.1176b-notice.pdf; Template-Pub-Cons-PN-for-MARA-website-MUL240023.pdf).

Procedural history and inconsistency

The applicant's own earlier documentation (Jacobs engineering AA screening determination, 1 November 2023: ECRIPP-GI-AA-Screening-Determination-(20231101).pdf) lists 179 ground-investigation locations, including three rotary core boreholes, twenty-four cable percussive boreholes with rotary follow-on, one hundred window samples, trial pits, dynamic probes, sediment sampling, and groundwater monitoring. Those methods would appear to be more intrusive in nature, and, in the case of rotary core and cable percussive with rotary follow-on, could fall within the "deep drilling" category which falls under EIA. The engineer for Iarnród Eireann's own 2023 determination concluded "No AA required" notwithstanding overlaps with multiple SACs and SPAs. In contrast, the public MUL240023 record appears to re-describe boreholes as "shallow" with "temporary" habitat loss (see: MUL240023-Irish-Rail-EIA-Consideration-Form.pdf; MUL240023-SISAA-report.pdf; MUL240023-Revised-SISAA.pdf; MUL240023-NIS.pdf; S.1176a-Revised-NIS.pdf; LIC240023_AA_Screening_and_Determination_Irish_Rail_FINAL_Signed-2_redacted-1.pdf), which could result in the omitting of the full depth and quantity of interventions which could lead to a potential downplaying of the spatial extent to avoid EIA thresholds. We note that was a withdrawn LIC application after AA consultation/determination for the same project, followed by re-presentation of what seems to be essentially the same GI works under a MUL application as survey investigations.

Nature and extent of works – pre-construction, not preliminary survey

The scale, methods and recurrence, as detailed in the various application documents and proceeding public consultation on design options, would point to activities more in line with pre-construction works. The application documents detail slit trenches up to approximately 4 m long by 1 m wide by 2 m deep to be excavated with an excavator, and seismic refraction/MASW using repeated drop-hammer blows with geophones spiked ~100 mm into the substrate (see: MUL240023-SISAA-report.pdf; MUL240023-Revised-SISAA.pdf; MUL240023-AIMU-Report.pdf). Vessel campaigns seem to be designed for full coverage: 100% seabed coverage bathymetry with dense main lines and cross-lines up to mean high water, plus shoreline lines at high tide and additional drone surveys to close gaps. MARA's own screening notes GI/geophysics in the first 12 months and other works on multiple occasions across a requested 10-year licence, which appears to be a rolling programme rather than a one-off reconnaissance (see: LIC240023_AA_Screening_and_Determination_Irish_Rail_FINAL_Signed-2_redacted-1.pdf; Request-for-Observations-from-Public-Bodies.pdf). The intertidal programme

targets the “footprint of future ECRIPP works” in licence areas, which would suggest these might potentially be rather more enabling works essential to construction rather than neutral baseline sampling (MUL240023-SISAA-report.pdf; MUL240023-Revised-SISAA.pdf). The four licence areas (A–D: Merrion–Dún Laoghaire; Dalkey–Killiney; Bray–Greystones; Greystones–Wicklow) are within or immediately adjacent to South Dublin Bay and River Tolka Estuary SPA, Rockabill to Dalkey Island SAC (reefs, sandbanks, harbour porpoise), Dalkey Island SPA (terns, kittiwake), Wicklow Head SPA, and The Murrough Wetlands SAC / Kilcoole SPA, as well as BirdLife IBA IE091 (“The Murrough”) and the Kish–Bray Bank foraging corridor (see: NIS; SISAA; Revised SISAA; S.1176a-Revised-NIS.pdf).

Deep drilling thresholds and EIA requirements

The Jacobs engineering 2023 AA Screening Determination (ECRIPP-GI-AA-Screening-Determination-(20231101).pdf, pp. 7–8) specifies “cable percussive boreholes with rotary follow-on” to depths of approximately 20–30+ metres, and “rotary core” boreholes to similar depths. These would appear to exceed the European Commission’s “shallow drilling” notion (often <10 m below seabed in practice for sensitive locations) and meet the EIA Directive Annex II category 2(d) (“deep drillings”) when carried out in a marine environment. The spatial coverage (well beyond 5 km of linear works when accounting for line kilometres and intertidal transects) and location within multiple SACs/SPAs also engage Annex II screening via Schedule 7 criteria for “project characteristics” (duration, repetition, intensity), “location” (sensitivity of the receiving environment), and “type and characteristics of the potential impact” (underwater noise, SSC, habitat damage). It appears incorrect for the EIA Consideration Form (MUL240023-Irish-Rail-EIA-Consideration-Form.pdf) to focus solely on the label “shallow” boreholes when the applicant’s previous engineering documents would have described activities of a more intrusive nature.

Potential EIA avoidance

Under the EIA Directive (2011/92/EU, as amended), deep drilling, geotechnical investigations and preparatory works forming part of a larger development must be assessed if they are functionally or physically linked to the main project. Here, the MUL240023 works seem to us, to be of a preparatory nature to ECRIPP’s coastal infrastructure works and not in fact, discrete or stand-alone. The application documents seem to present an inclination towards project splitting. We consider that heavy intrusive works and nearshore acoustic campaigns should not be advanced under a MUL for investigative surveys. CJEU jurisprudence (C-392/96 Commission v Ireland; C-142/07 Ecologistas en Acción) prohibits any segmentation to avoid EIA thresholds, requiring components to be assessed together when functionally interdependent. People Over Wind (C-323/17) confirms mitigation cannot be used at screening to rule out likely significant effects; Holohan (C-461/17) requires assessment of functionally linked land/sea and cumulative effects; Waddenzee (C-127/02) requires certainty beyond reasonable scientific doubt of no LSEs. MARA should not classify GI as

sub-threshold based on the “shallow/temporary” label, because this could be seen to fail to apply Schedule 7 in a reasoned way (duration over ten years, repeated multi-modal campaigns, four-area footprint, proximity to Natura 2000 features), and could result in allowing project segmentation without requiring an integrated EIA screening of the whole project. The EIA Consideration Form does not adequately engage with temporal scale, repetition, spatial breadth, or combined noise/physical disturbance (MUL240023-Irish-Rail-EIA-Consideration-Form.pdf).

Cumulative and in-combination assessment flaws

The SISAA and NIS appear to apply narrow parameters for cumulative assessment: a 5 km CESS spatial scope for GI/geophysics and only the licence polygon for other surveys, and a 3-year temporal scope for GI/geophysics with a ten-year horizon for other surveys limited to the polygon (MUL240023-SISAA-report.pdf; MUL240023-Revised-SISAA.pdf). This excludes along-coast ecological linkages, mobile species ranges, and propagation of underwater noise and SSC beyond polygon edges. The tables then screen out major projects with apparently formulaic findings of “no” or “temporary/localised only” impacts/effects.

The most significant shortfalls in the cumulative effects assessments relate to: EirGrid MUL240010, Codling Wind Park MUL230034 and FS007546, Dublin Array, and Arklow Bank Phase 2, all of which have real temporal and ecological overlaps with Areas A–D.

EirGrid MUL240010 (Application-for-a-Maritime-Usage-Licence_R5_F01_sign-off_redacted.pdf; MUL240010-NIS.pdf; MUL240010-Subsea-Noise-Technical-Report.pdf) covers South Dublin Bay from Blackrock Park to Poolbeg with geophysical and geotechnical works (boreholes, vibrocore/CPT), benthic sampling, UAV intertidal survey, metocean deployments, and includes a subsea noise report for MBES/SSS/USBL/parametric SBP. EirGrid’s own NIS (Appendix C “Other Projects”) acknowledges spatial and possible temporal overlap with Codling MUL230034 and Dublin Cables in South Dublin Bay, precisely the corridor the Irish Rail MUL intends to survey, yet Irish Rail’s NIS/SISAA do not properly integrate MUL240010 in their assessment. Codling MUL230034 and Codling’s FS007546 investigations extend into the same ecological corridor to the south; Dublin Array’s cable landfall at/near Shanganagh Cliffs overlaps the Areas A–B coastline; Arklow Bank Phase 2 landfall at Johnstown North lies immediately south of Area D (The Murrough littoral cell). None of these are appear to be assessed with spatially explicit cumulative SSC or cumulative noise (SELcum) modelling. Instead they are dismissed as “early stage”, “localised”, or “temporary” without quantitative analysis (MUL240023-SISAA-report.pdf; MUL240023-Revised-SISAA.pdf; MUL240023-NIS.pdf). This approach would seem to fail the Holohan test.

Omissions in cumulative impact analysis – operational detail

EirGrid MUL240010 proposes trenching and jetting of subsea cables in shallow coastal waters, with associated rock placement for protection. These activities can create

prolonged SSC plumes and high underwater noise from jetting pumps. Codling MUL230034 involves extensive geophysical survey arrays, drilling, and anchor positioning within the same seasonal windows. MUL240023 omits in part, a full operational detail of these overlaps, preventing a realistic combined SSC or SELcum noise footprint assessment (see: MUL240010-NIS.pdf; MUL240010-Subsea-Noise-Technical-Report.pdf; public material on Codling MUL230034 supplied via MARA's portal).

Misclassification of habitat loss and over-reliance on mitigation

The application treats repeated, multi-year intrusion in sensitive foreshore and nearshore Annex I habitats as "temporary" and "non-significant", including dunes, saltmarsh, vegetated shingle, stony/rocky reefs, and sandbanks (MUL240023-NIS.pdf; MUL240023-SISAA-report.pdf; MUL240023-Revised-SISAA.pdf; S.1176a-Revised-NIS.pdf). Permanent effects are in effect, more foreseeable: rotary and cable percussive drilling removes substrate; jack-up spudcans deform and compact the seabed; repeated access compacts intertidal sediments; window sampling and trial pits disrupt the marine benthos; repeated vessel passes degrade epifaunal communities. Recovery times for vegetated shingle, pioneer saltmarsh and dune systems can be years to decades, which is incompatible with "temporary" claims over a ten-year licence with seasonal re-entries. Mitigation measures (seasonal timing, MMO presence, "soft-starts") are generic, and would seem to be unverified for effectiveness in these habitat types, and it seems, are asserted without post-works monitoring evidence. They are also practically unenforceable in the Irish marine context (see "Governance and enforcement incapacity" below).

Suspended sediment (SSC) and reef/intertidal impacts asserted without adequate modelling

The AIMU and NIS claim that any seabed disturbance from grabs/cores/trenches will be "no greater than background variability during storms", with negligible water-quality or reef effects (MUL240023-AIMU-Report.pdf; MUL240023-NIS.pdf). There is no adequate nearshore hydrodynamic plume modelling, residence-time estimates, or sufficient deposition-contour analysis for Areas B–D despite the presence of Qualifying Interest Reefs [1170] and sensitive intertidal features (Dalkey Island, Wicklow Head, The Murrough). The SISAA's Zone of Influence for Rockabill to Dalkey Island SAC sets 1 km for "habitat degradation – changes in water quality" and 500 m for disturbance, yet there appears to be no quantitative analysis showing that slit trenches, intertidal cores or subtidal grabs will not drive turbidity/smothering beyond those distances in shallow embayments where fine sediments can be retained and recycled by currents (MUL240023-SISAA-report.pdf; MUL240023-Revised-SISAA.pdf). In Area D, subtidal day-grabs are scheduled for May–August, which coincides with peak Little Tern breeding and foraging, increasing the likelihood of water clarity reduction and prey base impact exactly when sensitivity peaks (MUL240023-SISAA-report.pdf; MUL240023-Revised-SISAA.pdf).

Sediment-sensitive features

Suspended sediment from rotary and percussive drilling can smother benthic species such as *Sabellaria spinulosa* (ross worm), *Sabellaria alveolata* (honeycomb worm) reefs and horse mussel (*Modiolus modiolus*) beds, which NPWS reef surveys have documented in the Irish Sea (https://www.npws.ie/sites/default/files/publications/pdf/IWM150.pdf). These biogenic reefs are slow-growing and recover poorly once buried. The NPWS 2024 reef report identifies "smothering by sediment deposition" as a key deterioration pressure for both intertidal and subtidal reefs, including in Rockabill to Dalkey Island SAC. The applicant does not seem to have produced SSC modelling to demonstrate that deposition thresholds protective of these communities will not be exceeded on any tide or under spring-tide conditions.

Underwater noise: under-specified sources, generic modelling, Annex IV gaps

The documents list MBES at 200–700 kHz with source levels around 200–228 dB re 1 µPa @ 1 m, and shipping noise of 160–175 dB; the Annex IV RA seems to confirm a parametric SBP (INNOMAR SES-2000 Compact) with ~247 dB source level and secondary frequencies of 4–15 kHz, which are directly relevant to odontocete hearing (MUL240023-SISAA-report.pdf; MUL240023-RA-Annex-IV-species-report.pdf; MUL240023-Revised-RA-Annex-IV-species-report.pdf; MUL240023-AIMU-Report.pdf). In Area D alone, two SBP lines of approximately 9.1 km and 10.4 km, plus dense MBES coverage pushed as close as possible up to mean high water, could create a prolonged acoustic presence within breeding/foraging seasons. Yet the Annex IV RA reproduces Southall et al. PTS/TTS tables without site-specific isopleths or combined SELcum for actual duty cycles, line spacings, run times and shallow-water propagation. Modal stacking—MBES + SSS + SBP + drilling + USBL—does not seem to be adequately summed; simultaneous projects (EirGrid/Codling/Dublin Array) are not integrated; seasonal residency over long licences is inadequately addressed. Mitigation remains NPWS (2014) MMO/soft-start only; the revised RA states "no additional mitigation beyond NPWS (2014)" and repeats the loophole that once ramp-up starts there is no requirement to halt at night, if visibility worsens, or if marine mammals are within 500 m (MUL240023-Revised-RA-Annex-IV-species-report.pdf). That would suggest an admission of weak control when risk is highest, contrary to strict protection and *Waddenzee*. There is no mention of a Regulation 54 / Article 12 derogation licence despite likely disturbance to Annex IV species in Rockabill to Dalkey Island SAC, Lambay and Codling Fault Zone, which would seem to present a procedural flaw (MUL240023-RA-Annex-IV-species-report.pdf; MUL240023-Revised-RA-Annex-IV-species-report.pdf).

Noise analysis – apparent contradictions and cumulative gaps

Earlier materials and the RA would seem to treat drilling as short-term and highly localised, yet the borehole schedule and line-kilometre totals appear to suggest multi-

day to multi-week presence per area, repeated over seasons across a ten-year licence. The approach seems to model single sources in isolation and provides inadequate campaign-level SELcum sums that include drilling, MBES, SSS, SBP and USBL together, nor does it appear to include EirGrid's MBES/SSS/USBL/SBP stack (MUL240010-Subsea-Noise-Technical-Report.pdf) or Codling's investigation arrays. This would seem to represent a material omission given odontocete sensitivity to cumulative exposure in shallow, reflective coastal waters.

Site-specific impacts – The Murrough–Kilcoole SPA, SAC and IBA (with 2024 seaward extension)

The Murrough SPA boundary was extended approximately 2 km seaward in the 2024 NPWS boundary review to capture offshore foraging habitat of terns, red-throated diver and other seabirds and migratory birds (NPWS SPA boundary review documentation; The Murrough – SPA). This area overlaps with BirdLife IBA IE091 ("The Murrough IBA"), confirming the functional link between the Kilcoole colony and adjacent marine waters. These offshore extensions encompass shallow sand/gravel bars and benthic prey zones that are directly within the proposed SBP and MBES line plans in Area D (MUL240023-SISAA-report.pdf; MUL240023-Revised-SISAA.pdf). The NIS does not appear to adequately account for the new marine SPA extension, and seems to treat the designation as if limited to the upper beach and back-barrier wetlands, which could result in an overlooking of the sensitivity of offshore foraging grounds during May–August to repeated vessel transits, acoustic disturbance and SSC plumes from sediment sampling. It also omits overlap with the IBA for wintering waterbirds and staging terns, which extends the sensitivity window beyond summer and into passage and winter months.

Murrough SPA and IBA mapping gaps

The 2024 NPWS seaward extension (~2 km) of The Murrough SPA aligns closely with BirdLife International's 2024 IBAs, which covers key tern and kittiwake foraging habitat. The applicant's mapping in the NIS/SISAA seems to omit the IBAs polygon entirely, resulting in a spatial underestimation of potential overlap and impact footprint (MUL240023-NIS.pdf; MUL240023-SISAA-report.pdf). This mapping gap, together with insufficient bird density mapping, weakens all subsequent screening and assessment conclusions for Area D.

Site-specific impacts – Rockabill to Dalkey Island SAC and associated SPAs

Rockabill to Dalkey Island SAC contains Qualifying Interest Reefs [1170] (including intertidal rocky reef off Dalkey Island) and Annex II species habitats, notably harbour porpoise. The Killiney intertidal reef, though undesignated, is ecologically connected to Dalkey's reef system and lies within the coastal works corridor. Drilling and seabed penetration near reef features risks physical damage, smothering from sedimentation, and long-term community shifts, yet the NIS appears to downplay SSC effects despite NPWS's reef vulnerability guidance (MUL240023-NIS.pdf; MUL240023-SISAA-

report.pdf; MUL240023-Revised-SISAA.pdf). Bird species using adjacent SPAs (Dalkey Island SPA; South Dublin Bay and River Tolka Estuary SPA) include kittiwake, tern species, guillemot, razorbill, red-throated diver and shag, are all sensitive to disturbance in the inshore foraging zone.

Rockabill–Dalkey SAC – prey ecology link

Beyond direct physical reef damage, sedimentation and drilling disturbance in the Dalkey-Killiney reef and submerged sandbank system can reduce abundance of prey fish such as sandeels (Ammodytidae) and clupeids, which are critical to maintaining and restoring the FCS of SPA features including kittiwake, guillemot, razorbill and tern. This prey link is not adequately acknowledged in the NIS or AA screening (MUL240023-NIS.pdf; MUL240023-SISAA-report.pdf), even though displacement of prey or turbidity-related reductions in foraging efficiency are central to site integrity.

Strict protection and deterioration obligations (harbour porpoise, kittiwake, roseate tern; SSCOs and precaution)

Article 12(1)(d) of the Habitats Directive requires strict protection, prohibiting deterioration or destruction of breeding and resting places for Annex IV species. The European Commission's guidance on strict protection (PI_COM_C(2021)7301_EN_TXT.pdf) confirms this applies outside Natura 2000 boundaries where those habitats are functionally linked and that the precautionary principle applies where uncertainty exists. The 2021 IWDG harbour porpoise report (HPRD21_Final Report copy.pdf) for Rockabill to Dalkey Island SAC records a 46% decline in density since 2016 (from 1.55 to 0.83 porpoises/km^2) and the lowest abundance in the series (≈227±39 individuals). That decline cannot be overlooked in the current application. Under Article 12, such trends demand intensified protection and an assessment of habitat deterioration risk; yet the applicant seems to provide no such adequate analysis and incomplete appraisal of how construction-scale noise, increased vessel traffic, sediment plumes, and prey displacement might exacerbate the decline in harbour porpoise (strictly protected within its range) or interact with foraging concentrations along the Kish–Bray banks and within its SACs. There appears to be a lack of meaningful scientific assessment of the absence or adequacy of SSCOs; but the guidance makes clear that absence of SSCOs should heighten precaution, not reduce obligations. It appears that red-listed kittiwake is not assessed with population-status sensitivity. The 2021 LIFE Roseate Tern project final recommendations report warned that further loss of foraging grounds will undermine recovery, but the we find that the applicant's NIS (and revised NIS) treats species-status issues generically and without fine-scale prey resource analysis (MUL240023-NIS.pdf; SISAA; Revised SISAA).

Concerns over otter omissions

Otter (Lutra lutra) is a Qualifying Interest for The Wicklow Mountains SAC and an Annex II/strictly protected species. NPWS surveys confirm use of coastal and estuarine foraging areas along for example, the Murrough and Shanganagh /Killiney Bay.

MUL240023 appears to omits this species from adequate assessment, failing to properly assess potential deterioration of breeding/resting sites as required by Article 12(1)(d) and the European Commission's 2021 strict protection guidance (MUL240023-NIS.pdf; PI_COM_C(2021)7301_EN_TXT.pdf). Intertidal slit trenches, trial pits near vegetated shingle and dune habitats, increased crew access, and repeated vessel activity can directly and indirectly disturb otter.

Public participation and transparency gaps

During the 2024 "design options" consultation, a 257-page Planning & Environmental Constraints (PEA-style) report was referenced but not published, undermining early public participation and environmental consideration at the formative stage (CCA1-POSR-Appendix-A-Planning-and-Environmental-Constraints-Report-Part-1.pdf. That pattern appears to persist in this MUL application, where critical screening logic sits across disparate PDFs and mapping gaps which could potentially impede informed comment.

Governance and enforcement incapacity – why mitigation cannot be relied upon

Mitigation-dependent "no AEoI" conclusions are not generally credible in Irish waters given the absence of enforceable oversight. The 2021 NPWS review found that the NPWS lacks the capacity to regulate and enforce marine protections against anthropogenic pressures. MARA appears to have no active on-site oversight or regulation capability (no dedicated inspection vessels, no continuous monitoring, no independent MMO/PAM observer regime operated by the authority). Even well-worded licence conditions are, in practice, unenforceable at sea during operations. This would lead us to the conclusion that, under the precautionary and preventive principles, impact avoidance at source through full EIA and a comprehensive AA is required before any consent is contemplated.

MARA and NPWS enforcement gaps

As far as we are aware, MARA has no active offshore patrol or inspection programme to ensure licence compliance during works, and NPWS has no dedicated marine enforcement vessel or ability to respond in real time to any potential non-compliance offshore by any MUL licence holder. In such a governance setting, promised mitigation (e.g., for marine mammals, adhering to SSC thresholds, respecting seasonal blackouts) is not an effective safeguard. It follows that granting MUL240023 on the basis of mitigation, as per MARA approaches to previous MUL applications suggests, should not proceed in this case.

Why EIA should be required

EIA is required because the works, taken together, amount to prolonged intrusive activities across a long coastline, with repeated multi-season operations in and adjoining multiple Natura 2000 sites, and with what appear to be significant underwater noise and SSC impacts. Schedule 7 screening must consider the ten-year duration,

repetition, multi-modal footprint (acoustic sources, drilling, trenching, grabs, drones, vessel presence), the sensitivity of the location (reefs, sandbanks, benthic communities, roseate terns, dolphin, minke whale, seals, harbour porpoise, otter), and the characteristics of the impacts (potential permanent substrate removal, smothering, behavioural displacement, threshold shifts). An acceptance by MARA of the applicant's "shallow/temporary" categorisation, or willingness to treat works as separated survey investigations alone rather than functionally linked to construction, or acceptance of a narrowed cumulative scope, together could suggest a potential avoidance of EIA that seems to us to be plainly necessary. A fresh, reasoned EIA screening is required on the full scope and context; if significant effects are likely, a full EIA must precede any consent.

Conclusion and determination sought

Given the scale, depth, and spatial extent of works in and adjacent to multiple Natura 2000 sites, the apparent omissions and understatements in the application, and a seeming failure to assess cumulative effects with future overlapping projects (especially EirGrid MUL240010 and Codling MUL230034/FS007546), an absence of site-specific SSC modelling and campaign-level cumulative noise modelling, the mapping and receptor-range, the established deterioration of habitat for harbour porpoise, kittiwake, and roseate/little terns, and what we perceive to be a lack of enforceable mitigation under current NPWS/MARA capacities, MUL240023 should not be granted without a full EIA and a comprehensive AA of the entire ECRIPP project as a single undertaking. Proceeding on the basis of the current apparent 'site investigation only' label, could potentially breach the Habitats and Birds Directives, the EIA Directive, and Ireland's obligations under the precautionary and preventive principles. MARA should refuse the application in its present form or, at minimum, suspend determination and require an integrated EIA that: (i) treats the MUL works as integral or pre-construction; (ii) models SSC and SELcum with named overlapping programmes (EirGrid MUL240010, Codling MUL230034/FS007546, Dublin Array, Arklow Bank), receptor-based zones of influence and seasonal windows; (iii) and replaces reliance on generic mitigation with impact avoidance demonstrably consistent with site integrity and strict protection obligations.

Please acknowledge receipt of this public submission in writing and keep us informed of further developments in this application, we wish to reserve the right of reply to any responses to public submissions from the applicant.

With thanks for this opportunity to express our concerns,

Blue Ireland Coalition CLG

Killiney Bay Community Council

Coastal Concern Alliance